

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:15-MJ-789-BK

v.

ROBBIE ALFREDO Trevino

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, **Robbie Alfredo Trevino**, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

Crime of violence (18 U.S.C. § 3156);

Maximum sentence life imprisonment or death

10 + year drug offense

Felony, with two prior convictions in above categories

Serious risk defendant will flee

Serious risk obstruction of justice

Felony involving a minor victim

Felony involving a firearm, destructive device, or any other dangerous weapon

Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendants because there are no conditions of release which will reasonably assure (check one or both):

x Defendant's appearance as required

x Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against the defendant(s) because (check one or both):

Probable cause to believe defendant committed a 10+ year drug offense, 18 U.S.C. § 3142(e)(2), or firearms offense, 18 U.S.C. § 924(c)

Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing:

x At first appearance

After continuance of _____ days (not more than 3).

DATED this 28th day of October, 2015.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

s/ Keith Robinson

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October, 2015, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorney of record who has consented in writing to accept this Notice as service of this document by electronic means: the Federal Public Defender.

s/ Keith Robinson

KEITH ROBINSON
Assistant United States Attorney